

**RECEIVED**

MAY 20 2020

TONY R. MOORE CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

UNITED STATES OF AMERICA	*	
	*	
VERSUS	*	5:20-cr-00109-01
	*	Judge Foote
ANGELENA ADAMS,	*	Magistrate Judge Hornsby
a.k.a. ANGELENA MORRIS	*	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

**Making & Subscribing to a False Return**  
**[26 U.S.C. § 7206(1)]**

A. At all times relevant to this Indictment:

1. The Defendant, **Angelena Adams, a.k.a. Angelena Morris**, was employed as a tax return preparer at a third party tax preparation business in the Ringgold, Louisiana area from approximately 2008 through 2012.

2. Beginning in or around January 2012 and continuing through an unknown date in 2015, **Angelena Adams, a.k.a. Angelena Morris** owned and operated Angie's Tax Service in Ringgold, Louisiana.

3. Angie's Tax Service prepared and submitted client tax returns electronically to the Internal Revenue Service ("IRS").

4. During calendar years 2013 through 2015, Angie's Tax Service utilized Drake Software to file over 5,000 client tax returns with the IRS.

5. In 2013, the business income from Angie's Tax Service was deposited into **Angelena Adams, a.k.a. Angelena Morris's** personal bank account at Regions

Bank by Drake Software via EPS Financial. **Angelena Adams, a.k.a. Angelena Morris** did not report all of her wages and salaries on her Form 1040, U.S. Individual Income Tax Return, for tax year 2013.

6. In 2014, the business income from Angie's Tax Service was deposited into **Angelena Adams, a.k.a. Angelena Morris's** personal bank account at Regions Bank by Drake Software via Republic Bank. **Angelena Adams, a.k.a. Angelena Morris** did not report all of her wages and salaries on her Form 1040, U.S. Individual Income Tax Return, for tax year 2014.

7. In 2015, the business income from Angie's Tax Service was deposited into **Angelena Adams, a.k.a. Angelena Morris's** personal bank account at Regions Bank by Drake Software via Republic Bank. **Angelena Adams, a.k.a. Angelena Morris** did not report all of her wages and salaries on her Form 1040, U.S. Individual Income Tax Return, for tax year 2014.

B. On or about October 15, 2014, in the Western District of Louisiana, the Defendant, **Angelena Adams, a.k.a. Angelena Morris**, did willfully make and subscribe a document that purported to be a Form 1040, U.S. Individual Income Tax Return, for tax year 2013 on behalf of herself, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That document, which the Defendant caused to be prepared and subscribed in the Western District of Louisiana filed with the Internal Revenue Service, stated on line 37 that her adjusted gross income in 2013 was \$166,011, whereas, as she then knew and there knew, that her

adjusted gross income was substantially more than \$166,011 in 2013, all in violation of Title 26, United States Code, Section 7206(1). [26 U.S.C. § 7206(1)].

**COUNT 2**  
**Making & Subscribing to a False Return**  
**[26 U.S.C. § 7206(1)]**

A. The allegations in Paragraph A of Count 1 are re-alleged and incorporated by reference herein.

B. On or about July 14, 2015, in the Western District of Louisiana, the Defendant, **Angelena Adams, a.k.a. Angelena Morris**, did willfully make and subscribe a document that purported to be a Form 1040, U.S. Individual Income Tax Return, for tax year 2014 on behalf of herself, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That document, which the Defendant caused to be prepared and subscribed in the Western District of Louisiana filed with the Internal Revenue Service, stated on line 37 that her adjusted gross income was in 2014 was \$169,519, whereas, as she then knew and there knew, that her adjusted gross income was substantially more than \$169,519 in 2014, all in violation of Title 26, United States Code, Section 7206(1). [26 U.S.C. § 7206(1)].

**COUNT 3**  
**Making & Subscribing to a False Return**  
**[26 U.S.C. § 7206(1)]**

A. The allegations in Paragraph A of Count 1 are re-alleged and incorporated by reference herein.

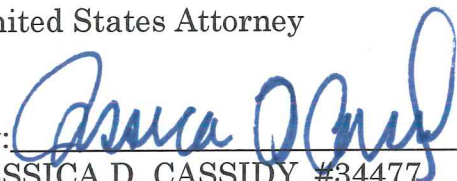
B. On or about June 30, 2016, in the Western District of Louisiana, the Defendant, **Angelena Adams, a.k.a. Angelena Morris**, did willfully make and subscribe a document that purported to be a Form 1040, U.S. Individual Income Tax Return, for tax year 2015 on behalf of herself, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That document, which the Defendant caused to be prepared and subscribed in the Western District of Louisiana filed with the Internal Revenue Service, stated on line 37 that her adjusted gross income was \$31,052 in 2015, whereas, as she then knew and there knew, that her adjusted gross income was substantially more than \$31,052 in 2015, all in violation of Title 26, United States Code, Section 7206(1). [26 U.S.C. § 7206(1)].

A TRUE BILL:

***REDACTED***

GRAND JURY FOREPERSON

DAVID C. JOSEPH  
United States Attorney

By:   
JESSICA D. CASSIDY, #34477  
Assistant United States Attorney  
300 Fannin Street, Suite 3201  
Shreveport, LA 71101  
Telephone: (318) 676-3600